

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**MÖLNLYCKE HEALTH CARE  
AB,**  
a Sweden corporation

Plaintiff,

v.

**MEDWAY GROUP, INC,** a Georgia  
corporation.

Defendant.

Civil Action No.:

**JURY TRIAL DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Mölnlycke Health Care AB (“Mölnlycke”) sues Defendant MedWay Group, Inc. (“MedWay” or “Defendant”) and alleges as follows:

**NATURE OF THE ACTION**

1. This is an action for patent infringement of United States Patent No. D737,453 (“the ’453 patent”) and United States Patent No. D743,564 (“the ’564 patent”) (collectively, “the Mölnlycke Patents”), arising under the patent laws of the United States, 35 U.S.C. §§ 1 *et. seq.*

2. The infringing products at issue are foam dressings for use in wound care and management. Mölnlycke notified Defendant of its infringement of the ’453

patent under 35 U.S.C. § 271 in a cease and desist demand letter on September 18, 2024.

3. Mölnlycke further notified Defendant of its infringement of the '564 patent in a cease and desist demand letter on November 26, 2024.

4. Despite such notification of the Mölnlycke Patents and its infringement of the same, Defendant has continued to sell and offer for sale infringing products.

5. As a result, Defendant in this case is a willful infringer of the Mölnlycke Patents.

6. Mölnlycke brings this action seeking monetary damages, a preliminary and permanent injunction, and other such relief as set forth herein.

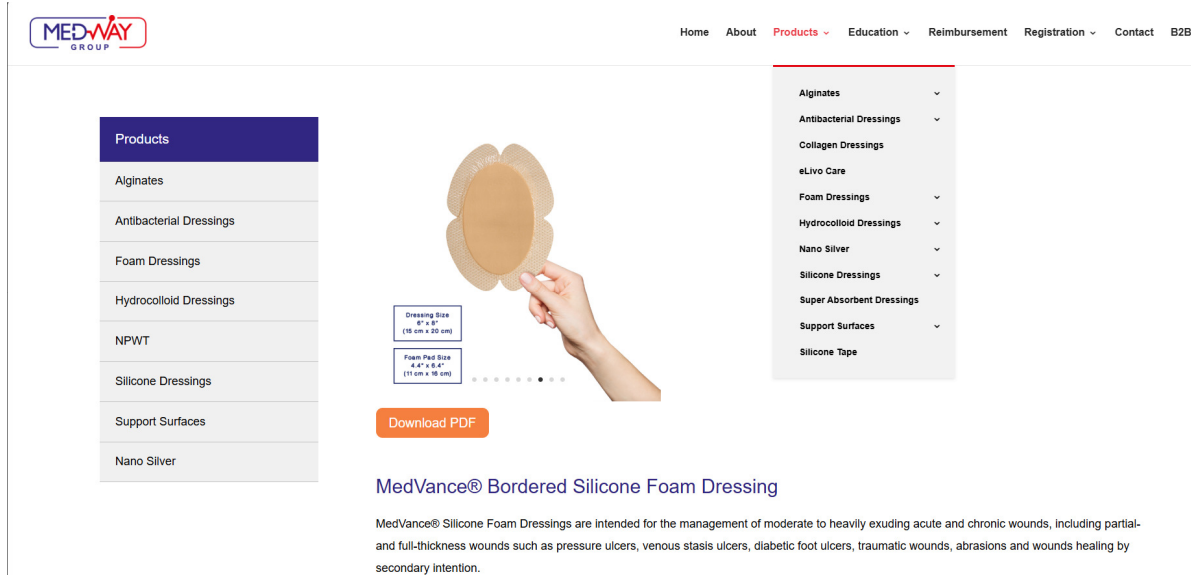
### **THE PARTIES**

7. Plaintiff Mölnlycke is a corporation organized and existing under the laws of Sweden. Its principal place of business is located at Entreprenörsstråket 21, SE-431 53 Mölndal, Sweden. Mölnlycke also has a sales office in Georgia and two production facilities in Maine.

8. On information and belief, and according to the Georgia Corporations Division filings, Defendant is an active corporation organized and existing under the laws of the State of Georgia, with a principal office address listed as 229 General Screven Way, Suite B-C, Hinesville, Georgia 31313. On information and belief, and

as listed on the [www.medwayus.com](http://www.medwayus.com) website, Defendant has a regular and established place of business at 1650 Horizon Parkway, Suite 450, Buford, Georgia 30518.

9. On information and belief, Defendant does business online under the names “MedWay Group,” “MedWay US” and “MedWay” and operates websites located at [www.medwayus.com](http://www.medwayus.com) and [www.medwayus.net](http://www.medwayus.net). Below are screenshots from Defendant’s [www.medwayus.com](http://www.medwayus.com) website captured on May 13, 2025:<sup>1</sup>




<sup>1</sup> <https://medwayus.com/products/medvance-silicone-bordered/>

**MEDWAY GROUP**

Home About **Products** Education Reimbursement Registration Contact B2B

**Products**

- Alginates
- Antibacterial Dressings
- Foam Dressings
- Hydrocolloid Dressings
- NPWT
- Silicone Dressings
- Support Surfaces
- Nano Silver



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**MedVance® Bordered Silicone Foam Dressing**

MedVance® Silicone Foam Dressings are intended for the management of moderate to heavily exuding acute and chronic wounds, including partial- and full-thickness wounds such as pressure ulcers, venous stasis ulcers, diabetic foot ulcers, traumatic wounds, abrasions and wounds healing by secondary intention.


Alginates  
Antibacterial Dressings  
Collagen Dressings  
eLivo Care  
Foam Dressings  
Hydrocolloid Dressings  
Nano Silver  
Silicone Dressings  
Super Absorbent Dressings  
Support Surfaces  
Silicone Tape

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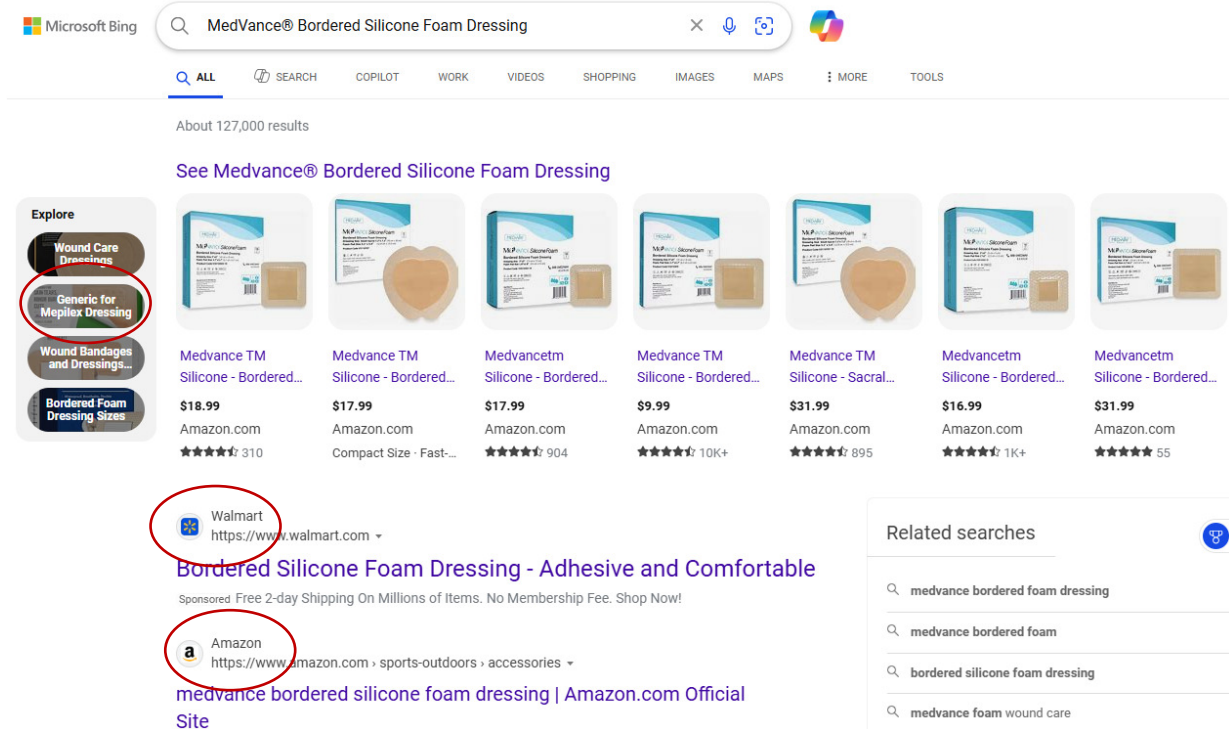
**MedVance® Bordered Silicone Foam Dressing**

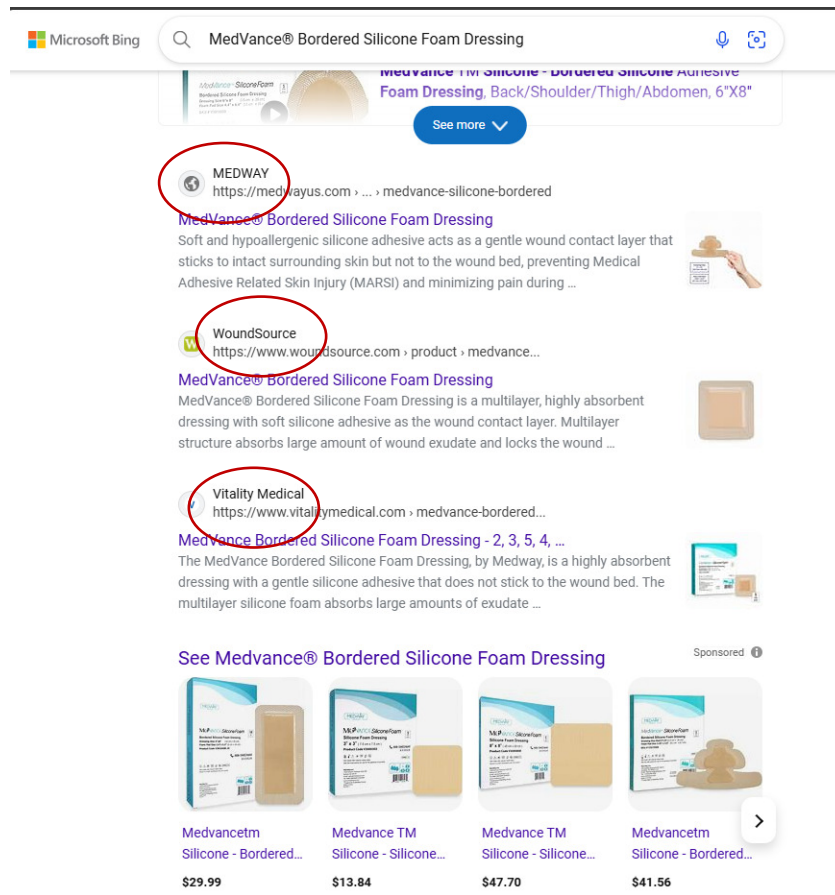
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Alginates  
Antibacterial Dressings  
Collagen Dressings  
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Foam Dressings  
Hydrocolloid Dressings  
Nano Silver  
Silicone Dressings  
Super Absorbent Dressings  
Support Surfaces  
Silicone Tape

10. Defendant makes, uses, imports, offers for sale and sells foam dressings that infringe the Mölnlycke Patents. Through a long list of third-party vendor websites, Defendant makes, uses, imports, offers for sale and sells foam dressings that infringe the Mölnlycke Patents.

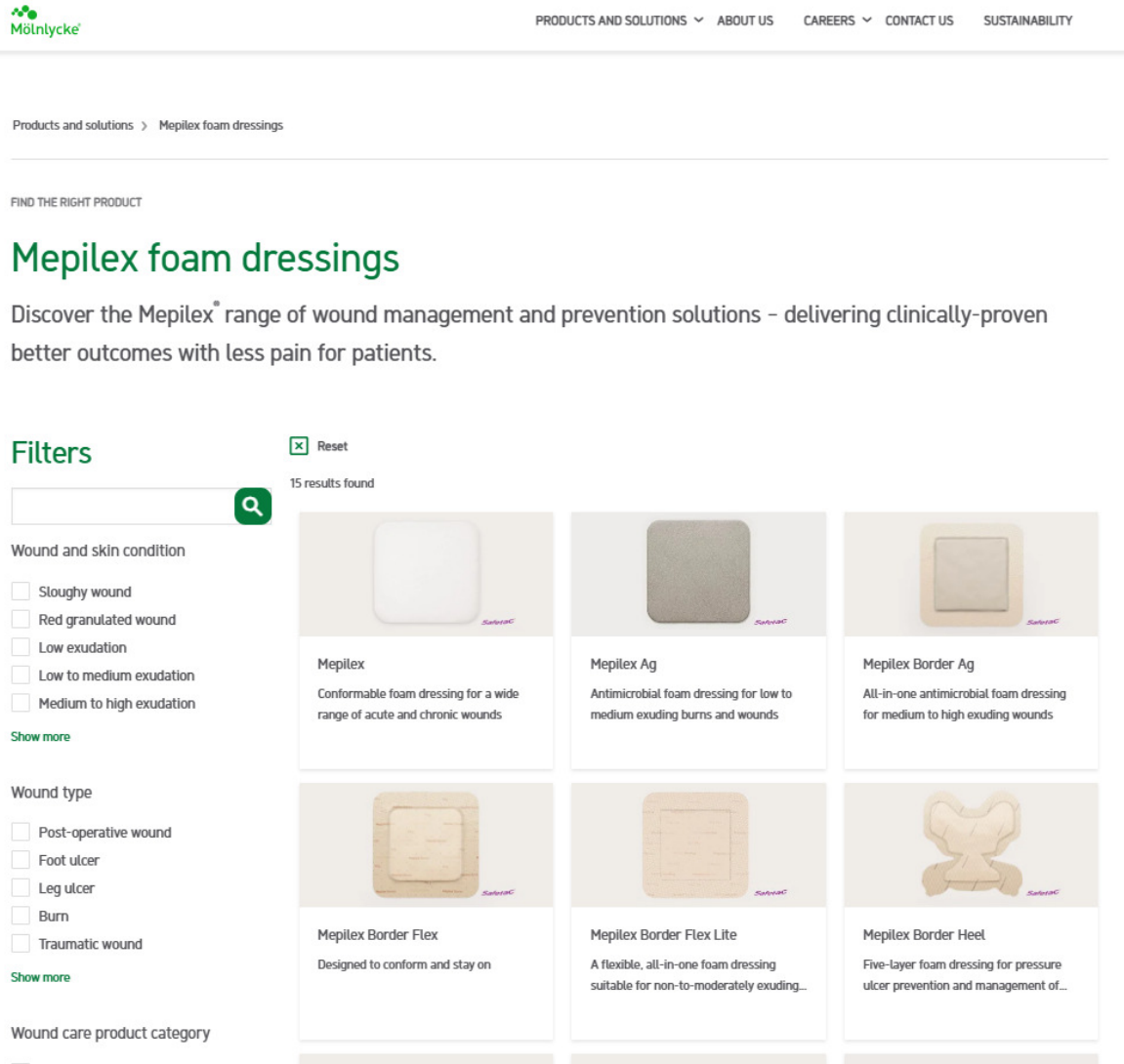
11. For example, in the annotated screen captures below of a search engine search for MedWay's MedVance™ Bordered Silicone Foam Dressing, visited on May 13, 2025, many vendors offer Defendant's infringing foam dressings for sale.





12. In the screen capture above of a search engine search for MedWay's MedVance™ Bordered Silicone Foam Dressing, visited on May 13, 2025, one suggested search associated with MedWay's MedVance™ Bordered Silicone Foam Dressing is "Generic for Mepilex Dressing," "Mepilex" being the name of Mölnlycke's patented foam dressing products line as shown in the screen capture below:<sup>2</sup>

<sup>2</sup> https://www.molnlycke.us/products-solutions/mepilex-foam-dressings/



13. On information and belief, most sales of Defendant's products are of generic (i.e., without a particular "brand" identified) infringing foam dressings and products.

14. On September 18, 2024, Mölnlycke sent a letter via email and Federal Express, addressed to the Legal Department, MedWay Group, Inc. at 1650 Horizon Parkway, Suite 450, Buford, GA 30518, informing Defendant of their infringement of Mölnlycke's '453 patent. This letter is attached as Exhibit A.

15. This letter also attached a copy of the '453 patent, provided details about Mölnlycke's intellectual property rights and enforcement activities, and demanded that Defendant immediately cease and desist its infringement.

16. On October 4, 2024, Defendant responded indicating that "[t]he Medway Group has confirmed with me that it will cease all manufacture, distribution, and sale of its MedVance Silicone Foam bordered dressing after selling its limited supply on hand and in any event shall cease all manufacture, distribution, and sale of its MedVance Silicone Foam bordered dressing by the end of this calendar year 2024." This response is attached as Exhibit B.

17. Mölnlycke later noted that the MedVance Silicone Foam Bordered Dressing product was still listed on Amazon.com (<https://www.amazon.com/MedVance-TM-Silicone-Bordered-dressings/dp/B07C6DR693>) at least as of February 10, 2025.

18. On November 26, 2024, Mölnlycke notified Defendant that it was infringing another Mölnlycke design patent, the '564 patent, by MedWay's MedVance Silicone Foam Bordered Dressing ("Heel Product"), and as identified as Dressing Size Heel 5"x8" (without limitation to different sizes). This notification is attached as Exhibit C.

19. Despite Mölnlycke providing Defendant with notice of its infringement of the '453 patent on September 18, 2024, and the '564 patent on



November 26, 2024, and with full knowledge its infringement of the Mölnlycke Patents, Defendant has, and continues to, make, use, and import infringing foam dressings into the United States and offer to sell and sell them online. A subsequent letter sent from Mölnlycke to Defendant on February 21, 2025, detailing Defendant's continued infringement is attached as Exhibit D.

20. For at least these reasons, and those discussed herein, Defendant's manufacture, use, importation, offers to sell, and sale of infringing foam dressings complained of herein have been, and continue to be, willful.

### **JURISDICTION AND VENUE**

21. The causes of action herein for patent infringement arise under the patent laws of the United States, including, without limitation, 35 U.S.C. § 271.

22. This Court has exclusive subject matter jurisdiction over these claims for patent infringement pursuant to 28 U.S.C. §§ 1331 and 1338(a).

23. This Court has personal jurisdiction over Defendant at least because Defendant has committed acts of direct patent infringement in Georgia, including in this judicial district, and is incorporated in Georgia.

24. Venue is proper in this district under 28 U.S.C. §§ 1391(b), (c), and 1400(b) because Defendant has committed acts of infringement, and maintains a regular and established place of business, in this judicial district.

**FIRST CLAIM FOR RELIEF**

**(Patent Infringement—35 U.S.C. § 271)**

**INFRINGEMENT OF U.S. PATENT NO. D737,453**

25. Mölnlycke incorporates by reference each and every allegation contained in Paragraphs 1 through 24 as though fully set forth herein.

26. Mölnlycke owns all right, title, and interest in the '453 patent, which was duly and legally issued to Mölnlycke by the United States Patent and Trademark Office on August 25, 2015.

27. Attached as Exhibit E to this Complaint is a true and correct copy of the '453 patent.

28. The '453 patent relates generally to foam dressings for wound care.

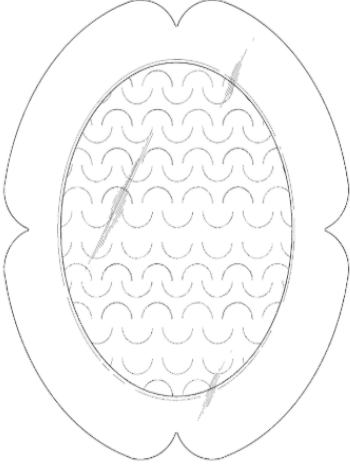

29. The '453 patent is valid and enforceable.

30. Defendant has infringed and is infringing the '453 patent in violation of 35 U.S.C. § 271(a) by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States, foam dressings for wound care and management.

31. The specific model of MedWay's MedVance™ Bordered Silicone Foam Dressing identified above was obtained by Mölnlycke during its investigation leading to this Complaint from Defendant's online listings on the [www.medwayus.com](http://www.medwayus.com) and [www.amazon.com](http://www.amazon.com) websites.

32. At least the MedWay MedVance™ Bordered Silicone Foam Dressing bears a design that, from the perspective of an ordinary observer, is substantially the same as the claimed design of the '453 patent.

33. As a non-limiting example, set forth below is a claim chart with a description of Defendant's infringement of the '453 patent by MedWay's MedVance™ Bordered Silicone Foam Dressing.

The '453 Patent	MedWay's MedVance™ Bordered Silicone Foam Dressing
	

34. Under 35 U.S.C. § 284, by reason of Defendant's infringing activities, Mölnlycke has suffered, and will continue to suffer, substantial damages in an amount to be proven at trial.

35. Under 35 U.S.C. § 289, by reason of Defendant's infringing activities, Mölnlycke is entitled to an additional remedy for infringement of design in the

amount of total lost profits.

36. Defendant's acts complained of herein have damaged and will continue to damage Mölnlycke irreparably.

37. Mölnlycke has no adequate remedy at law for these wrongs and injuries.

38. Mölnlycke is therefore entitled to a preliminary and permanent injunction restraining and enjoining Defendant's and their agents, servants, and employees, and all persons acting thereunder, in concert with, or on their behalf, from infringing the claims of the '453 patent.

39. Defendant is not licensed or otherwise authorized to make, use, import, sell, or offer to sell any foam dressing claimed in the '453 patent, and Defendant's conduct is, in every instance, without Mölnlycke's consent.

40. On information and belief, Defendant's infringement of the '453 patent has been, and continues to be, willful since at least as early as September 18, 2024, when it had actual notice of the '453 patent and its infringement of the '453 patent.

**SECOND CLAIM FOR RELIEF**

**(Patent Infringement—35 U.S.C. § 271)**

**INFRINGEMENT OF U.S. PATENT NO. D743,564**

41. Mölnlycke incorporates by reference each and every allegation contained in Paragraphs 1 through 40 as though fully set forth herein.

42. Mölnlycke owns all right, title, and interest in the '564 patent, which was duly and legally issued to Mölnlycke by the United States Patent and Trademark Office on November 17, 2015. Attached as Exhibit F to this Complaint is a true and correct copy of the '564 patent.

43. The '564 patent relates generally to foam dressings for wound care.

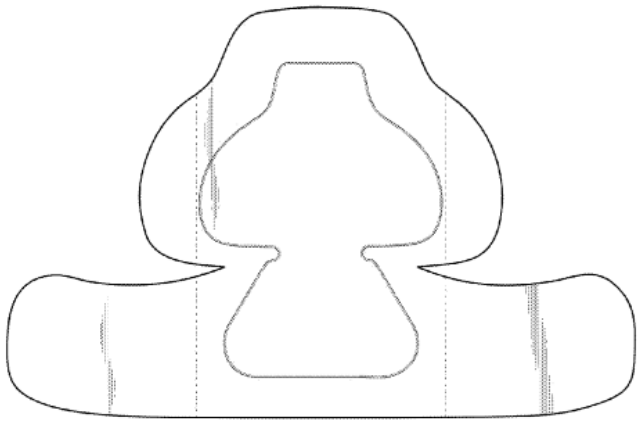

44. The '564 patent is valid and enforceable.

45. Defendant has infringed and is infringing the '564 patent in violation of 35 U.S.C. § 271(a) by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States, foam dressings for wound care and management.

46. The specific model of MedWay's MedVance™ Bordered Silicone Foam Dressing identified above was obtained by Mölnlycke during its investigation leading to this Complaint from Defendant's online listings on the [www.medwayus.com](http://www.medwayus.com) and [www.amazon.com](http://www.amazon.com) websites.

47. At least the MedWay's MedVance™ Bordered Silicone Foam Dressing bears a design that, from the perspective of an ordinary observer, is substantially the same as the claimed design of the '564 patent.

48. As a non-limiting example, set forth below is a claim chart with a description of Defendant's infringement of the '564 patent by MedWay's MedVance™ Bordered Silicone Foam Dressing.

The '564 Patent	MedWay's MedVance™ Bordered Silicone Foam Dressing
	

49. Under 35 U.S.C. § 284, by reason of Defendant's infringing activities, Mölnlycke has suffered, and will continue to suffer, substantial damages in an amount to be proven at trial.

50. Under 35 U.S.C. § 289, by reason of Defendant's infringing activities, Mölnlycke is entitled to an additional remedy for infringement of design in the amount of total lost profits.

51. Defendant's acts complained of herein have damaged and will continue to damage Mölnlycke irreparably.

52. Mölnlycke has no adequate remedy at law for these wrongs and injuries.

53. Mölnlycke is therefore entitled to a preliminary and permanent injunction restraining and enjoining Defendant and their agents, servants, and employees, and all persons acting thereunder, in concert with, or on their behalf, from infringing the claims of the '564 patent.

54. Defendant is not licensed or otherwise authorized to make, use, import, sell, or offer to sell any foam dressing claimed in the '564 patent, and Defendant's conduct is, in every instance, without Mölnlycke's consent.

55. On information and belief, Defendant's infringement of the '564 patent has been and continues to be willful, since at least as early as November 26, 2024, when it had actual notice of the '564 patent and its infringement of the '564 patent..

### **PRAYER FOR RELIEF**

WHEREFORE, Mölnlycke prays for judgment against Defendant as follows:

A. A judgment that Defendant has infringed and is infringing each of the Mölnlycke Patents;

B. A judgment that such infringement is willful;

C. An order, pursuant to 35 U.S.C. § 283, preliminarily and permanently enjoining the Defendant and their subsidiaries, affiliates, parents, successors, assigns, officers, agents, representatives, servants, and employees, and all persons in active concert or participation with them, from continued infringement of the Mölnlycke Patents;

D. An order, pursuant to 35 U.S.C. § 284 and/or 35 U.S.C. § 289, requiring Defendant to pay Mölnlycke its damages caused by Defendant's infringement of the Mölnlycke Patents and that such damages be adequate to compensate Plaintiff for Defendant's infringement, but in no event less than a reasonable royalty or Defendant's total profits for the use made of the invention by Defendant, together with interest and costs as fixed by the Court;

E. An order, pursuant to 35 U.S.C. § 284, requiring Defendant to pay Mölnlycke treble damages as a result of Defendant's willful infringement;

F. An order declaring this case exceptional pursuant to 35 U.S.C. § 285 and awarding Mölnlycke its reasonable attorneys' fees, litigation expenses and expert witness fees, and costs; and

G. An order that Mölnlycke have such other and further relief as the Court deems just and proper.



**JURY TRIAL DEMAND**

Pursuant to Fed. R. Civ. P. 38(b), Plaintiff requests a trial by jury of all issues so triable.

DATED: June 12, 2025

Respectfully submitted,

By: /s/ Robert J. Leonard  
Robert J. Leonard (GA Bar No. 303694)  
**Meunier Carlin & Curfman LLC**  
999 Peachtree Street N.E., Suite 1300  
Atlanta, Georgia 30309  
Telephone: (404) 645-7700  
Facsimile: (404) 645-7707  
rleonard@mcciplaw.com

Jason A. Engel (IL Bar No. 6274878)\*  
Nolan R. Hubbard (IL Bar No. 6294332)\*  
Devdhi Kasana (IL Bar No. 6349319)\*  
**K&L Gates LLP**  
70 W. Madison Street, Suite 3100  
Chicago, IL 60602  
Telephone: (312) 807-4236  
jason.engel@klgates.com  
nolan.hubbard@klgates.com  
devdhi.kasana@klgates.com

*\*pro hac vice forthcoming*

*Attorneys for Plaintiff Mölnlycke Health  
Care AB*